

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON**

KIMBERLY TRENT,

Plaintiff,

v.

LEAH HUFFMAN,

Defendant.

**CASE NO. 6:17-cv-01906-MK**

**JOINT PRETRIAL ORDER**

**INTRODUCTION**

The parties have conferred regarding the Pretrial Order. This Pretrial order is being submitted in accordance with the Court's Order of January 11, 2022 and Local Rule 16-5.

**NATURE OF THE ACTION**

Plaintiff Kimberly Trent brought this action seeking damages for personal injuries she allege were sustained as the result of a motor vehicle collision that occurred on September 5, 2016 on Interstate 5 near Woodburn, Oregon. Plaintiff Kimberly Trent seeks both economic and noneconomic damages.

The parties have requested a jury trial.

**JURISDICTION**

This Court has jurisdiction under 28 U.S.C. § 1332, as this is a civil action in which the matter in controversy exceeds the sum or value of \$75,000, exclusive of interests and costs, and is between citizens of different states.

### **AGREED FACTS**

1. On September 5, 2016, Plaintiff was traveling southbound on Interstate 5 in Woodburn Oregon.
2. A collision occurred between Plaintiff and Defendant's vehicle in which Plaintiff's vehicle was struck from behind by Defendant's vehicle.

### **CLAIMS AND DEFENSES**

Plaintiff Kimberly Trent contends (as proposed by Plaintiffs' Joint Pre-Trial Order):

1. As a result of Ms. Huffman's negligence, Plaintiff sustained physical injuries as a result of the subject collision.
2. As a result of Ms. Huffman's negligence, Plaintiff has incurred medical expenses and will incur additional medical expenses in the future as a result of the injuries she sustained in the subject collision,
3. As a result of Ms. Huffman's negligence, Plaintiff has sustained income loss and will incur additional income loss in the future as a result of the injuries she sustained in the subject collision,
4. As a result of Ms. Huffman's negligence, Plaintiff has sustained damages and will sustain additional damages in the future for pain and suffering, disability, loss of enjoyment of life and other non-economic damages as a result of the subject collision.
6. Ms. Huffman was negligent in her operation of her vehicle and that negligence caused the alleged injuries and damages stated above.
7. As the owner of the subject tractor-trailer and the employer of Mr. Tillman, Mr. Tillman's negligence is imputed to CRE.

Defendant denies that Plaintiff was injured and denies that Plaintiff suffered any damages from the collision.

**OTHER LEGAL ISSUES**

At this time, none. However, the parties plan to raise issues regarding the admissibility of evidence in their pre-trial Motions in Limine.

DATED 12th day of September, 2022.

/s/ Joseph A. Grube

JOSEPH A. GRUBE

Attorney for Plaintiffs

/s/ Glenn E. Barger

Glenn E. Barger

Attorney for Defendants